

From: [Chen, Isaac](#)
To: [Angove, Sharon](#); [Houston, Robert](#); [Waldmeier, Joshua](#)
Subject: RE: NPDES permit coverage for liftboat operations
Date: Thursday, May 30, 2013 2:24:00 PM

I will work at home Tuesday. Please let me know the number or call me at 214-665-7364. Thanks.

From: Angove, Sharon
Sent: Thursday, May 30, 2013 2:17 PM
To: Chen, Isaac; Houston, Robert; Waldmeier, Joshua
Subject: RE: NPDES permit coverage for liftboat operations

Isaac,

Joshua set up a meeting next Tuesday for us to discuss lift boats. In the meantime, he said he would call Marsha to advise her in the interim.

Sharon Angove

Ms. Sharon Angove
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From: Chen, Isaac
Sent: Thursday, May 30, 2013 1:05 PM
To: Angove, Sharon; Houston, Robert; Waldmeier, Joshua
Subject: RE: NPDES permit coverage for liftboat operations

If the designated operator wants to cover the wellhead discharge under its eNOI, good. If not, the day-to-day operator (MODU, Liftboat, ...) needs to file an eNOI to cover the discharge. As long as the specific discharge is covered, please determine how 6EN wants the operator to do.

From: Angove, Sharon
Sent: Thursday, May 30, 2013 10:28 AM

To: Chen, Isaac; Houston, Robert; Waldmeier, Joshua
Subject: RE: NPDES permit coverage for liftboat operations

Isaac, Robert, Joshua

Since we are still considering how we want to handle lift boats, I will defer to you on how we respond to Marsha. Please advise.

Sharon Angove

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From: Marsha Lutz [<mailto:marsha.lutz@jccteam.com>]
Sent: Wednesday, May 29, 2013 9:35 PM
To: Angove, Sharon; Chen, Isaac; Houston, Robert; Waldmeier, Joshua
Subject: FW: NPDES permit coverage for liftboat operations

I know you may still be reviewing liftboat coverage. But I have a variation on questions below.

If a liftboat ties down to the seafloor but is immediately adjacent to the platform, can those workover or plugging discharges be covered under the PF for the Platform?

And regarding my question below about subsea wells – could the unwritten requirement that a new PF is needed whenever a rig moves more than 1500 feet be applied to liftboats that are plugging a well? So that if a well is anywhere within 1500 feet of the platform, then the plugging discharges could be covered under the Platform PF?

These things keep coming up and instead of getting new PFs for every liftboat operation (possibly unnecessarily), we want to see if at least sometimes they could be/are covered by an existing PF.

Thanks

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marsha.lutz@jccteam.com

From: Marsha Lutz
Sent: Friday, May 17, 2013 4:47 PM
To: 'Angove, Sharon'
Cc: Bius, Catherine; Nguyen, Helen; Chen, Isaac; Houston, Robert; 'Waldmeier, Joshua'
Subject: NPDES permit coverage for liftboat operations

Sharon

Thanks for the heads up. I will be looking forward to the course of action selected for lift boat coverage. It has been a bit confusing.

On Page 3 of the GMG290000 permit under I.A.2(e) Notice of Intent - a facility is defined. It also says that the NOI should cover each facility operated by the operator. The last sentence says "all well heads and infrastructures connected to the facility shall be considered parts of the host facility".

So it seem like this would cover subsea wells and that workover or plugging operations at the subsea well could be under the Permitted Feature of the Platform. Lift boats do a lot of this type work. We had been saying if it is rig, they go under MODU for structure type. And when we were told lift boats needed coverage, we put them under MODU. But again, it seems like the statement above would allow existing subsea well workover activity (or plugging) to be under the platform's Permitted Feature discharges. But since the NOI form shows subsea well as a separate type structure, we thought it needed a separate PF. I know when they are drilling the well, it is separate PF under MODU. I am referring to an existing well with follow-up activity.

Any clarification of this situation of subsea well work, aside from the lift boat issue, would be appreciated.

Thanks

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From: Angove, Sharon [<mailto:Angove.Sharon@epa.gov>]
Sent: Thursday, May 16, 2013 10:02 AM
To: Marsha Lutz; Nguyen, Helen
Cc: Bius, Catherine
Subject: RE: Issues with Digital Signature - Work Around

Marsha,

EPA had a meeting with a lift boat company that presented some unique scenarios regarding coverage. We have requested that lift boat company submit additional information to us, which will be reviewed by our permitting individuals to determine a course of action relative to lift boats.

You are welcome to contact Isaac Chen in the meantime regarding your rare situations for advice on what you client can do.

Sharon Angove

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From: Marsha Lutz [<mailto:marsha.lutz@jccteam.com>]
Sent: Thursday, May 16, 2013 8:37 AM
To: Nguyen, Helen
Cc: Angove, Sharon; Bius, Catherine
Subject: RE: Issues with Digital Signature - Work Around

Thanks Helen

Regarding the paper forms – the operator that told me that said they have printed the CDX forms and sent in to you when in a crunch and then followed up later with the eNOI. So maybe a PF was not issued but they were just trying to get coverage.

Sometimes a MODU will move with only 2 or 3 days notice (esp. the lift boats). With such a narrow

window, if there is trouble with CDX for a day, the signatory may not be immediately available the next day to process and then the boat would be there. Most of the time we do get a couple weeks notice and then it is not an issue. So I was just wanting to verify for those rare "emergency" type situations.

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From: Nguyen, Helen [<mailto:Nguyen.Helen@epa.gov>]
Sent: Thursday, May 16, 2013 7:57 AM
To: Marsha Lutz
Cc: Angove, Sharon; Bius, Catherine
Subject: Issues with Digital Signature - Work Around

Marsha,

Link to older version of Java (<http://www.oracle.com/technetwork/java/javase/downloads/java-archive-downloads-javase7-521261.html#jre-7u17-oth-JPR>)

Please note that the following unfortunate text appears on the page: "**They are not updated with the latest security patches and are not recommended for use in production.**"

The problem appeared with **Java Version 7 Update 21 (1.7.0_21)**.

I will have to check with our management because as far as you know we are not accepting paper forms.

Thanks,

Helen Nguyen
NetDMR & ICIS-NPDES Coordinator (6EN-WC)
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nguyen.helen@epa.gov

From: Marsha Lutz [<mailto:marsha.lutz@jccteam.com>]
Sent: Wednesday, May 15, 2013 4:30 PM
To: Nguyen, Helen

Subject: RE: NOI Approved by EPA for Razor Exploration, LLC, GMG290528

Thanks Helen

We have got some eNOIs to go through without adjusting JAVA. But other times it is an issue. Is the JAVA change what you mean by you work around? I have heard some operators say they have mailed in a print out of the ENOI form that is signed by hand since the submittal would not go through electronically. I assumed they received a PF when doing that. I do not want to do this method – but have you given out some PFs in this manner?

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From: Nguyen, Helen [<mailto:Nguyen.Helen@epa.gov>]
Sent: Wednesday, May 15, 2013 2:31 PM
To: Marsha Lutz
Cc: Angove, Sharon; Bius, Catherine
Subject: RE: NOI Approved by EPA for Razor Exploration, LLC, GMG290528

Marsha,

I haven't heard anything.... I think it was going to take about 3 weeks. You can still get your work done with our work around.

Thanks,

Helen Nguyen
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From: Marsha Lutz [<mailto:marsha.lutz@jccteam.com>]
Sent: Tuesday, May 14, 2013 4:31 PM
To: Nguyen, Helen
Subject: NOI Approved by EPA for Razor Exploration, LLC, GMG290528

Hi Helen

Below is the permitted feature I left you a voice mail about this afternoon.

Sorry – I did not remember that we can change the description in “Change Structure Info”. It was the lease no. that previously we were not able to change for a different client.

So to be clean, we will submit to our client a Change NOI to update the well number in the description.

Hopefully it goes through.

What is the latest on CDX fixing the Java use issue?

Thanks

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From: Douglas Schaefer [<mailto:dschaefer@offshoreservicesllc.com>]
Sent: Tuesday, April 09, 2013 6:43 AM
To: Marsha Lutz
Subject: FW: Final EPA Outer Continental Shelf (OCS) General Permit NOI Approved by EPA for Razor Exploration, LLC, GMG290528

Douglas Schaefer
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for any purpose, nor disclose all or any part of its contents to any other person. Thank you.

From: NeT@epa.gov [<mailto:NeT@epa.gov>]

Sent: Monday, April 08, 2013 5:12 PM

To: Douglas Schaefer; sarah.chapman@jccteam.com

Cc: sarah.chapman@jccteam.com

Subject: Final EPA Outer Continental Shelf (OCS) General Permit NOI Approved by EPA for Razor Exploration, LLC, GMG290528

2013-04-08

Your facility Razor Exploration, LLC, has been approved for coverage under the EPA's Outer Continental Shelf (OCS) General Permit, NPDES ID: GMG290000. Your NPDES ID will be: GMG290528, Effective: 2013-04-08 and Expiring 2017-09-30.

Based on the information you provided in your NOI, you are subject to monitoring and subsequent reporting requirements. Remember to review your permit to determine if you have additional requirements. You can also access more detailed information including Region 6 contacts and mailing address on our website:

<http://www.epa.gov/earth1r6/6en/w/offshore/home.htm>

A list of Permitted Features and Limits Sets are included for your records.

Permitted Feature ID: 0001, Lease Block Area Name: Galveston, Lease Block Area Number: 214, BOEM Number: SL 20130031, Type: MODU, Description: HERCULES 209-WELL #4, Latitude: 29.1264, Longitude: 94.8218, Limit Sets: HF,WF,CT,WW,DF,MD,WM

Note: Discharges that were authorized under the 2007 OCS General Permit are considered to have continued authorization during the period from the effective date of the 2012 OCS General Permit to the due date for Notices of Intent specified in Part I.A.2. This continued authorization is contingent on submittal of an NOI by the deadline specified. THIS DOESN'T APPLY FOR NEW ONES.

With respect to matters addressed in this email, the EPA reserves the right to take any enforcement action pursuant to the CWA, or any other available legal authority, including without limitation, the right to seek injunctive relief, monetary penalties and for punitive damages.

This is an automated response to inform you that processing of your NOI has been completed by the system; please do not reply to this email.